



Brenda Campbell
President and CEO

Board of Directors:

Max Mann- Chairperson
Baird Specialized Asset
Management

Sandy Dunst- Vice Chairperson
UW-Whitewater Foundation

Robert LaGrant- Secretary
BMO Private Bank

Isaac Woods- Treasurer
Rockwell Automation

Mike Bogard
Allworth Financial

Malado Cisse
Salesforce

Jackie Darr
Darr Advisors

Trinette Green
Milwaukee Public Schools

Xiaoting Hao
UW-Milwaukee

Otis Hosley Jr.
Wells Fargo

Kristen Irgens
Godfrey & Kahn

Larry Jolón
Molson Coors

Irina Kwiatkowska
Associated Bank

Lloyd Levin
American Fidelity Mortgage

Andréa Michel
Global Center for Trauma
Education and Training

Rebecca Neumann
UW-Milwaukee

David Polk
WI Dept. of Workforce
Development

Jon Smucker
Marietta Investment Partners

Anne Tidmore
Johnson Financial Group

Lindsay Whalesmith
Northwestern Mutual

WHY FERPA DOES NOT APPLY TO SECUREFUTURES’ MONEY PATH PROGRAM

Thank you for your interest in SecureFutures’ Money Path Program, a platform to teach teens and college students about their financial future through education and interaction with the Money Path web-based application. Money Path is a unique academic, career, and financial planning application specifically for teens and young adults, providing a step-by-step simulation of life after high school graduation. It connects the dots between career path and pay, college expenses and student loan debt, managing a budget, and establishing a timeline for achieving important financial and life goals.

Given the number of questions we have received on FERPA’s application to SecureFutures, we have put together answers to frequently asked questions to assist our education partners in their own compliance efforts.

Does FERPA Apply to SecureFutures or Its Products?

In short, no. FERPA applies to an “educational agency or institution,” which means any public or private agency or institution which is the recipient of funds under any federal education program. 20 USC § 1232g(a)(3). Because SecureFutures is a 501(c)(3) non-profit, receives no funding from the federal government, and is not an “educational agency or institution,” FERPA does not apply to SecureFutures.

But, Doesn’t SecureFutures Collect Information from Students?

Collecting information from students at K-12 institutions or colleges or universities is insufficient to make that information subject to FERPA, unless the information is provided to SecureFutures by an “educational agency or institution” like a school, college, or university, or is maintained on behalf of a person acting for a school, college, or university. Additionally, as will be explained below, SecureFutures does not require or need any education records from schools, colleges, or universities to provide its products to students. “Education records” are defined as “those records, files, documents, and other materials which— (i) contain information directly related to a student; and (ii) are maintained by an educational agency or institution or by a person acting for such agency or institution.” 20 USC § 1232g(a)(4); 34 CFR § 99.3.

Does SecureFutures Require or Receive Any FERPA Data from Schools to Operate Its Products?

No. SecureFutures is an entirely separate platform, which neither connects to any systems of a school, college, or university, nor requires an educational institution to provide student names, email addresses, or any other student information to provide its products. Normally, an educational institution will provide a link to the platform and a unique registration code to students as part of a class or a program at the school, college, or university.

Does SecureFutures Create Any Educational Records?

No. SecureFutures is purely for the benefit of individual students and their financial future. They do not receive grades or other pedagogical-related feedback. Rather, as described and agreed to in Money Path’s Privacy Policy, SecureFutures may create a report that is accessible by the student’s teacher. The report lists the date the student created an account, the date of last

log in, whether a survey was completed, and the types of career paths the student created. An educational institution will only have access to this information for the students that created an account with the unique registration code provided to the student. An educational institution does not need to provide any student information to SecureFutures in order to access this report.

Is the School Official Exemption Under FERPA Necessary for SecureFutures to Provide Its Products to Students?

No. FERPA permits education records to be disclosed to “school officials” for legitimate educational interests, 20 USC § 1232g(b)(1)(A), but SecureFutures, as mentioned above, receives no education records from schools, universities, or colleges, such that the school official exception would need to apply.

What Kind of Information Does SecureFutures Collect?

SecureFutures collects minimal information from students, including their first and last name, email address, and graduation year. Much of the information generated from SecureFutures’ products is hypothetical – *i.e.*, what a student’s finances will look like in the future if they make certain choices. Our products do not collect any sensitive information whatsoever. We maintain a privacy policy that describes how we handle any information inputted by students. While SecureFutures is not subject to FERPA, an easy way to understand the information collected by SecureFutures is that it would all be considered “directory information” under FERPA, 20 USC § 1232g(a)(5). That is, information “that would not generally be considered harmful or an invasion of privacy if disclosed.”

Additionally, we do not receive any financial information about students from any financial aid office or other administrative department at any school, college, or university. Rather, the limited financial information inputted (like the amount of a student’s scholarship if they are a college or university student) is entirely self-reported. And, students may choose whether to disclose that information – it is not required.

Can You Give Any Examples of Similar Platforms to SecureFutures to Further Explain Why FERPA Does Not Apply?

SecureFutures is similar (but also unique in its own right) to financial education programs provided online to students through the federal government and other non-profits. The easiest analogy is that SecureFutures is like a free loan calculator, or other websites that individuals may visit to determine how much a loan costs, how to control their expenses, or how best to allocate their money during school and thereafter. Just as an educational institution or teacher might share those kinds of links with its students, so may they do so with SecureFutures. But, simply pointing a student to an online platform like Facebook, an online loan calculator or financial website with similar functionality, or the Department of Education website, does not make that platform subject to FERPA, even if it is collecting information from students.

While FERPA does not apply to SecureFutures and the Money Path Platform, SecureFutures takes the privacy and security of the platform and the students who use it very seriously. We use all information provided by students to the extent necessary to provide students the platform to learn about their financial future and otherwise in accordance with our Privacy Policy, available at <https://moneypath.securefutures.org/money-path-app-privacy-statement/>.

If you have any further questions about FERPA and SecureFutures, please do not hesitate to contact Kristen Ruhl at kristen@securefutures.org.

About SecureFutures

SecureFutures is a 501(c)(3) nonprofit agency founded in 2006 as Make A Difference – Wisconsin by area business leader Lloyd Levin. Since 2006, we have served over 80,000 teens with successful, measurable, and timely lessons taught by volunteers, preparing 16-to-18-year olds on a range of real-life money matters before they enter adulthood.

24806288.2
30252804.2